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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 7

11201 Renner Boulevard Lenexa, Kansas 66219

SEP 0 3 2015

Mr. Paul V. Rosasco Project Coordinator Engineering Management Support, Inc. 7220 West Jefferson Avenue, Suite 406 Lakewood, CO 80235

Dear Mr. Rosasco:

The U.S. Environmental Protection Agency has reviewed the August 28, 2015 submittal titled, "Revised Work Plan for Additional Characterization of Extent of Radiologically-Impacted Material in Areas 1 and 2 West Lake Landfill Operable Unit-1, Bridgeton, Missouri," as prepared by Engineering Management Support, Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc. and the United States Department of Energy (the Respondents).

The EPA is approving the following elements of this work plan for immediate execution:

- Scope of Work and Objectives of the Investigation
- Field Investigation and Sample Collection and Analyses
- Schedule of defined activities from Mobilization through Data Validation.

The EPA also expects every effort will be made to minimize durations of the various approved scheduled activities, as discussed in the work plan and prior technical meeting. In general, performance of the fieldwork is clearly based on sonic drilling method and verified in our discussion on September 2, 2015; therefore, employment of other methods such as geoprobe and/or hollow stem auger rig(s) should in theory significantly shorten this activity's duration. As with prior Phase 1D fieldwork, potential schedule delays should be minimal (e.g., days not weeks) if caused by changing field drilling equipment to complete this investigation. If the sonic rig is not readily available, some other sample locations would still be amenable to the hollow stem auger method and could proceed while the sonic rig is mobilized on site.

The EPA is also approving the work plan's reporting section with regards to content but does not, however, approve the associated schedule durations identified under the Data Evaluation and subsequent Report portions. As previously discussed in the August 13, 2015 technical meeting and on September 2, 2015, these activities are not entirely linear. While some overlap time has been built into the revised schedule between these activities, it still does not reflect durations in the EPA's prior comment 3b submitted in our August 21, 2015 letter. Also, a deliverable for the submittal of the final revised report needs to be added to the schedule. Documentation of these changes, via submittal of change page(s), shall then be submitted to the EPA for approval within seven calendar days of receiving this letter.

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If you have any questions regarding this letter or need further clarification on our comments, please email or contact me at (913) 551-7611.

atos & p. 932 Sincerely,

Brad Vann

Remedial Project Manager

Missouri/Kansas Remedial Branch

Superfund Division

cc: Branden Doster, MDNR